



MSPC Advisory Circular

ENVIRONMENTAL PROTECTION AGENCY
OFFICE OF AIR PROGRAMS • MOBILE SOURCE POLLUTION CONTROL PROGRAM

A/C No. 3

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SUBJECT: Intermediate Durability Testing

The first publication of Advisory Circular #3 provided background on EPA's requirement to test durability vehicles at our Ann Arbor laboratory at certain mileage points during the 1973 model year certification program. The purpose of this reissuance is to provide further detail on the procedure for testing at Ann Arbor, specifically with respect to the use of alternate mileage points for official durability testing.

Discussion

Section 85.54 of the regulations, which provides for such testing, was carried forward from previously applicable regulations, and thus the principle of EPA testing of durability vehicles has long applied. That section was included in recognition of the fact that to provide assurance that prototype vehicles do in fact meet the applicable emission standards, a degree of direct Federal testing of such vehicles is necessary. The new emission control laboratory in Ann Arbor was built in part for the purpose of providing the EPA with the capability of making more tests of prototype vehicles than had been possible in the old, inadequate facilities at Willow Run. For the 1973 model year, as you have been advised by the Division of Certification and Surveillance, we plan to test durability vehicles that represent families of which 100,000 or more units will be sold at 12,000, 24,000, 36,000, and 50,000 miles or at substitute regular test points as arranged on an individual basis; for families of which between 10,000 and 100,000 units will be sold, to test one durability vehicle per family at 50,000 miles only; and for families of which fewer than 10,000 units will be sold, to require no confirmatory testing of durability vehicles. We plan to test all emission data vehicles at 4,000 miles.

The questions we received include specific issues on which it is necessary that we comment.

1. It has been suggested by a domestic manufacturer that the testing requirements for the 1973 model year unfairly discriminate against domestic automobile producers, because importers are not yet required to have tests made at the same mileage points at the Ann Arbor lab. It is true that we do not deem it feasible to require those few importers that sell 100,000 or more vehicles of one family to ship their vehicles to Ann Arbor for the 12,000, 24,000 and 36,000 mileage point tests. However, importers will have to send to Ann Arbor for the 50,000 mile test all durability vehicles that represent families of which 100,000

or more vehicles are expected to be sold in the U. S., and one durability vehicle per family of which between 10,000 and 100,000 vehicles are expected to be sold. This parallels the requirement for domestic manufacturers.

We have received analogous objections to this requirement from importers, who point out that this will impose on them a significant cost for air freight of vehicles that domestic manufacturers do not have. Thus it is in no sense clear whether, if there is in fact any lack of fairness, it is domestic or foreign manufacturers that are receiving unfair treatment. Clearly, it is not our intention to discriminate unfairly against either domestic or foreign manufacturers. However, we do not deem the impossibility of requiring importers of those few vehicle families that sell more than 100,000 units in the U. S. to send their cars to Ann Arbor for the intermediate mileage point tests to be a sufficient basis for not going as far as it is reasonably possible to go at this time in carrying out the certification program as it has long been planned to carry it out, and as it should be performed. We are at work on finding means by which, in the future, we can require the same level of testing of imported durability vehicles as for domestic vehicles.

2. A concern has been expressed about inter-laboratory correlation. We share this concern, but we do not believe that it should turn out to be an insuperable obstacle to our doing the testing that we believe we must do. The problem has existed for some time, and has applied to 4,000-mile testing of 1972 model emission data vehicles. In that testing, we ran into relatively few problems that could be attributed to laboratory correlation difficulties.

It is our view that the EPA testing that we will require of 1973 model durability vehicles should serve to help solve, rather than to exacerbate, any laboratory correlation problems that may exist. If serious discrepancies between company and EPA test results should be evident at the 12,000 or 24,000 mile points, such discrepancies themselves will flag the need to establish better correlation for such company laboratory with our Ann Arbor facility. If correlation problems that are identified in that manner are resolved, we would be prepared to consider adjusting the emission results achieved in our laboratory to reflect correlation differences that may thus have been established. During the 1973 model year certification process, therefore, we will have the opportunity to correct problems that have for some time been of concern to manufacturers as well as to our technical staffs.

Procedures

The EPA testing requirement that applies to intermediate mileage points of durability vehicles, as discussed in this Advisory Circular, represents the maximum normal EPA testing that will be required for the 1973 model year. We recognize that it is necessary for EPA to give a quick turn-around to durability vehicles subject to this testing. Therefore, the following procedure has been established:

1. Manufacturers should notify EPA, whenever possible, several days before durability vehicles covered by these ground rules is within +250 miles of the 12,000, 24,000, 36,000, and 50,000 mile test points, of the date on which the vehicle will be ready for testing. At that time, EPA will advise the manufacturer:
 - a. to bring the vehicle in for testing on that date; or
 - b. to bring the vehicle in at an alternative mileage test point (such as 16,000 or 28,000 miles); or
 - c. to bring the vehicle in at the next official EPA test point (24,000, 36,000, or 50,000 miles).
2. When EPA advises a manufacturer that a vehicle is to be brought in for testing at the current test point EPA will assign a specific time-slot in its testing schedule for that vehicle and will expect the vehicle to be delivered to the Ann Arbor facility by 10 AM of the day preceding the scheduled test.
3. If a vehicle is delivered to the EPA facility by 10 AM any work day (except Friday) it will be tested and returned to the manufacturer's custody by close of business the following day. If a manufacturer fails to deliver his vehicle for testing by 10 AM, prior to the day on which a test-slot is assigned, EPA will in all cases then require that the test at that point be made in the EPA facility. EPA will reschedule the test for the earliest possible time at which it can be fitted into its testing schedule.


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